

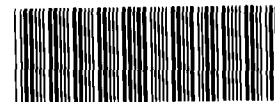
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EM-453 (A. Rampertaap, 3-8191)

Rocky Flats/Albuquerque Production Division Comments on the Health and Safety Plan for the Solar Ponds Area, Operable Unit 4, Rocky Flats Plant

Frazer Lockhart, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453), has reviewed the above-referenced document and is providing the attached comments. Please address these comments before the document is finalized.

Generally, I find that the document is overly detailed in some areas, notably those dealing with the specifics of operations being conducted from an engineering viewpoint. While it may be useful to have such detail in the health and safety plan, this also makes the plan a very long document. At 140 pages, it will be difficult to ensure adequate employee training covering the whole document.

Call me at FTS 301-903-8191 if you have any questions related to this request.

Antar Rampartoe  
Antar Rampartaan

Autar Rampertaap  
Rocky Flats Program Manager  
Office of Southwestern Area Programs  
Environmental Restoration

Attachment

cc w/o attachment:  
R. Greenberg, EM-453  
J. Ciocco, EM-453  
J. Hartman, RF  
S. Surovchak, RF  
B. Magee, HAZWRAP

ACTION Schachburg  
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DUE DATE 2/6/92

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VAETH, TA		
PAUOLE, AH		
BISHOP, ML		
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HARTMAN, J	X	
IZELL, K		
KAROL, MS		
MCBRIDE, MH		
SARGENT, D		
SIMONSON, DP		
WITHERILL, VF		
ADAMS, JJ		
ANDERSON, TW		
CRAUN, RL		
DUFFY, GG		
LEVERNIER, RJ		
LOCKHART, FR	X	X
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RASK, WC		
RUSCITTO, DG		
SCHASSBURGER	X	X
GRETHEL, T		
HARGREAVES, M		
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MALCHESKI, D		
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MILLER, HG		
NELSON, G		
NISHIMOTO, GI		
OSTMEYER, RM		
PIETSCH, E		
POSLUSZNY, J		
RAMPE, J		
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EM-453 COMMENTS ON HEALTH AND SAFETY PLAN FOR THE SOLAR PONDS AREA  
OPERABLE UNIT 4, ROCKY FLATS PLANT

1. Section 1.5, Process Description: This section has perhaps a fraction too much of an engineering slant. This might make it difficult for non-engineers to understand. A more simplified description might be in order.
2. Section 3.2, Chemical Hazards (begins on page 23): This section is written in a highly technical manner. Although it does a very good job of covering the subject, it will probably be difficult for a general site worker or a nontechnical visitor to understand what is being stated.
3. Section 3.3, Radiological Hazards: As with the above comment on Section 3.2, this section is written in a highly technical manner that may make it difficult to understand.
4. Section 3.4.1, Cold Stress: More emphasis should be included in this section on supervision's responsibility for being on the lookout for potential cold stress symptoms, since employees themselves may not be able to recognize these when so affected.
5. Section 3.4.2, Heat Stress: There is no inclusion of provisions for a cool rest area for break periods. More emphasis should also be placed on supervision's responsibility for being observant for symptoms of heat stress.
6. Section 3.3.4, High Winds: It is unclear whether site work is to be stopped when wind speed exceeds 15 miles per hour. Logically, it should, since sampling is to be suspended in such cases due to potentially contaminated dust being re-suspended in the air.
7. Section 3.8, Hazards by Work Activity and Job Description: A very thorough assessment of potential hazards associated with specific on-site tasks has been provided.
8. Section 4.0, Hazard Communication: This section contains an undefined abbreviation, WO, taken to mean "Waste Operations." Further, there should be a specific statement of a goal to provide all site employees with information and training concerning the specific hazards they might encounter in the course of their work.
9. Section 5.0, Site Control: The Contamination Reduction Zone as specified in this section does not appear to be of sufficient extent to adequately separate and allow control of movement to and from the Exclusion and the Support Zones. However, this may be simply an artifact produced by the site diagram. There are no dimensions given for the various zones in either the diagram or the text.
10. Section 6.0, Personnel Protection: This section provides a very good treatment of protective practices of all types as planned for this project.

11. Section 7.0, Material Handling Program: A good treatment of basic materials handling hazards and accident prevention practices during various material handling activities on this project.
12. Section 8.0, Decontamination: This is a brief yet well detailed outline of the subject of decontamination for mixed waste projects.
13. Section 10.0, Health and Safety Monitoring: This section is very detailed and to-the-point in its treatment of the personnel and area monitoring to be done and what they are used for. The OSHA and/or NIOSH procedures for sampling and analysis of the compounds of concern should be included as an additional appendix.
14. Overall, the document does not appear to have been reviewed by a technical editor. Sections throughout the document contain oddly or poorly worded statements, some of which are so confusing that they make the section difficult to understand.